

Stavis Seafoods Inc Safety Programs

**CORPORATE OFFICE:
212 NORTHERN AVENUE
BOSTON, MA 02210**

**WRITTEN SAFETY AND HEALTH
PROGRAMS**

RECEIPT OF HANDBOOK ACKNOWLEDGMENT

This is to acknowledge that I have received my personal copy of the Stavis Seafoods Inc Safety Team Member Handbook. This Handbook is the primordial Operation Safety Policy and Procedure Manuals.

I understand that it is my responsibility to read and become familiar with the practices contained within and to consult my Resource or Safety Team representatives should I have a need for any clarification. When a guideline does not address a situation, Team Members and Resources are expected to rely on the values and beliefs of Stavis Seafoods Inc. As we continue to develop and improve our systems, these guidelines will reflect various changes in the best interest of Stavis Seafoods Inc Operations and our employees.

The safety programs will be reviewed annually by the Resource/Point person and Program Owners. The purpose of the review is to ensure that the program is current, accurate, and up-to-date. It should evaluate any accidents, near-misses and trends associated with the program, permits, training, etc. to determine any program gaps.

Please sign below to acknowledge that you have received your copy.

Signature

Date

Print Name

Social Security Number

SAFETY COMMITMENT STATEMENT

Stavis Seafoods Inc feels Team Members are the most valued resource. It is our policy to take all necessary and responsible steps to eliminate or reduce exposure of Team Members to accidental injury and conditions which may adversely affect their health. No job is so important that we cannot take time to perform our work safely.

We believe all injuries are preventable. Accident prevention and efficient distribution go hand in hand. We all have a primary responsibility for the safety and well-being of each other. This responsibility can be met only by working continuously to promote safe work practices among everyone and to maintain property and equipment in a safe operating condition. We believe in the "Power of Two." A Team Member has the power to stop a job when uncertain or uncomfortable with safety. Additionally, a Team Member may stop a co-worker when they are concerned for their safety.

Safe practices on the part of each other MUST be part of all operations. No job shall be considered successfully completed unless we have followed every precaution and safety rule to protect ourselves and our fellow Team Members. The ideals of distribution and safety must be inseparable.

Stavis Seafoods Inc is committed to continually improving our safety performance, and will authorize the necessary programs to achieve this objective. The expectation of all of us is to be active participants in our safety efforts and in turn, as a team, will achieve positive results in our safety and health practices.

Joe Mello	Site Lead
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Chris Cook	Plant Mgr.
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Jeremy A. Okwuosa	Safety Director.
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Adam Medeiros	Production Mgr
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Gus Gomes	IQFPackaging Line
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Jim McDonough	Shipping&Receiving
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Safety Management

SAFETY TEAM

Purpose: To establish a Safety Team to provide participation and leadership opportunities in safety and promote a work environment free from injury through the development, implementation and maintenance of the Site Safety Systems.

Philosophy: Stavis Seafoods Inc feels Team Members are the most valued resource. It is our policy to take all necessary and responsible steps to eliminate or reduce exposure of Team Members to accidental injury and conditions which may adversely affect their health. No job is so important that we cannot take time to perform our work safely.

A Safety Team has been established and contains the following elements:

- a) Team Members
- b) Management
- c) Periodic Meetings
- d) Meeting minutes documented.
- e) Minutes are retained for three years.

Team responsibilities include:

- a) Review of periodic, scheduled safety inspections.
- b) Review of injury, illness, and near miss investigations. This includes property loss/damage.
- c) Review of investigations of alleged hazardous condition brought to the attention of any team member.
- d) Ability to conduct its own investigations or inspections to determine remedial solutions.
- e) Development of action plans for the prevention of future incidents.
- f) Evaluate all safety suggestions.
- g) Verify abatement actions taken by management on OSHA citations (upon request of your state/federal OSHA).

HAZARD PREVENTION AND CONTROL

Purpose: To create a reference manual with all the necessary information so Team Members can enjoy a safe and rewarding career at Stavis Seafoods Inc

Philosophy: We believe that as adults, we are all responsible for managing ourselves. We all desire to work in a safe environment that considers each of our individual circumstances.

Procedure: This Handbook attempts to cover the information you need to know about practices, policies, procedures and work guidelines as related to Team Member safety. Because conditions change, changes to policies, procedures, and guidelines are inevitable. Therefore, we will publish the Safety manual annually, to include changes. It is your responsibility to ensure you are working from the most current version of the Handbook and to read and become familiar with the practices contained within.

Safety program training will occur during New Employee Orientation and annually for Team Members. On-the-job safety training will be provided on all OSHA required topics as well as site selected training topics. Some examples of the training are:

Powered Industrial Trucks	Hazcom
Personal Protective Equipment	Emergency Preparedness
Equipment Lockout/Tag out Procedure	

Stavis Seafoods Inc also will provide other specific occupational safety training as we familiarize ourselves with them, including Safety bulletins and signs posted throughout the facility should be observed.

DISCIPLINE---Horseplay or practical joking is forbidden in the facility or on company premises. A consistent disciplinary system will be administered to all team members who disregard safety rules and procedures. A progressive discipline process is in place for dealing with individuals who repeatedly exhibit unsafe behaviors.(need disciplinary action for violators)

Safety violations are of great concern to Stavis Seafoods Inc and are considered very serious. Discipline is determined after thorough investigation has been completed identifying accident causes. If the investigation reveals that an unsafe act contributed to the incident, the Team Member may receive corrective action up to and including dismissal.

WORKSITE ANALYSIS

- Purpose:** To audit the site for any unsafe conditions and manage any unsafe conditions discovered.
- Philosophy:** Stavis Seafoods Inc feels Team Members are the most valued resource. It is the policy to take all necessary and responsible steps to eliminate or reduce exposure of Team Members to accidental injury and conditions which may adversely affect their health. No job is so important that we cannot take time to perform our work safely.
- Procedure:** Routine hazard assessments, inspections or audits are conducted of the facility process and operations to proactively identify safety hazards. The assessment/inspection results are documented to ensure that identified hazards are corrected.

JOB SAFETY ANALYSIS

Job Safety Analysis (JSA) are reviewed annually for every job title. The JSA's are used to further train and educate team members on safety hazards, precautions, and procedures.

INCIDENT INVESTIGATION

A prompt and thorough written incident investigation is conducted with Resource participation. Corrective actions identified during the investigation have been implemented. "Near-misses" are reported and investigated. The Safety team receives and reviews all incident reports.

TREND ANALYSIS

Routine trend analysis' of injuries and illnesses are conducted in an effort to direct the safety and accident prevention efforts in a preventive direction.

INJURY RESPONSE PROCEDURE

Purpose:	To ensure that on-the-job injuries requiring medical treatment or first aid are treated appropriately, and to ensure that injuries are reported and investigated in an effective and timely manner.
Philosophy:	Stavis Seafoods Inc feels Team Members are the most valued resource. It is our policy to take all necessary and responsible steps to eliminate or reduce exposure of Team Members to accidental injury and conditions which may adversely affect their health. No job is so important that we cannot take time to perform our work safely.
Procedure:	This procedure is to ensure that on-the-job injuries requiring medical treatment or first aid are reported and treated in a timely and appropriate manner.

DESCRIPTION/ADMINISTRATION

- All on-the-job injuries must be reported immediately (on the shift and day that the injury occurs) to Safety Team Personnel, and call (800) 836 0975, within 24 hours of injury. Initial investigation must occur within 24 hours. Root cause analysis must occur within 48 hours. Safety Team Members and the injured employee must jointly decide if:
 - a) **Emergency medical care by a physician is necessary**
dial 911, and transport the injured individual to the closest medical facility.
 - b.) **If the injury is not a medical emergency but does require medical attention:**

A safety Team member must transport employee to medical facility. Risk Mgmt Post Accident packet must accompany the Safety Team Member to the medical facility.

c.) If injury is determined to be first aid, or no treatment is needed, the accident must still be reported as a first aid, or near miss incident.

- If the Safety Team Member feels the need for medical attention by a physician and the employee does not, the Safety Team Member must insist on the precautionary visit and accompany him/her to the doctor's office.
- If the employee and the Safety Team Member agree, a "wait and see" approach to the injury can be taken and a near miss report completed. The Safety Team Member must advise the employee that, if later he/she feels the need to see a physician, doctor's appointment will be made for him/her by the manager however, if the employee insists on seeing a doctor at the time of the injury, the Safety Team Member is to accompany him/her to the doctor's office.
- All physician appointments will be scheduled through the following doctor's offices per employee preference or appointment availability:

U.S. Health Works

8315 Century Park Court , Suite 110

Kearny Mesa, CA 92123

858-277-2744

After Hours:

This is a 24 hour / 7 days a week medical facility

MODIFIED-DUTY PROGRAMS

Purpose: To provide a safe, healthy workplace with the objective of minimizing unsafe acts and conditions that might cause injury or illness to Team Members. It is also our policy to comply with applicable laws and regulations in order to ensure a safe workplace.

Philosophy: **The Stavis Seafoods Inc safety program is built upon awareness and prevention.**

Procedure: To provide constructive, rehabilitative, temporary, modified duty work (when available), to Team Members who have been injured on the job. Constructive, temporary, modified duty work is available in most cases for individuals with work related injuries.

Modified duty work will consist of job duties in accordance with the physician's prescribed limitations and, whenever possible, will be conducted on the Team Member's present shift and department.

Modified duty work (when available) will be arranged provided the Employee has obtained a release to perform such work from the Industrial Physician or approved Personal Physician. All work release information must be submitted to the Resource immediately after returning from a scheduled appointment.

If modified duty is available, the Team Member will continue to earn his / her normal hourly rate while on an authorized modified duty program.

The maximum time available for modified duty is ninety (90) calendar days in all cases, regarding physician approved modified duty limitations. If the 90 day maximum is reached, the Employee will be placed on temporary disability until the he/she has received a release for full duty work and submitted this release to their Resource, the Risk Manager and the Human Resource Department.

Individuals on modified duties are not eligible to work overtime. In case of non-work related injuries, which might limit the Employee's ability to perform his/her normal duties, modified duty work is **NOT available, except in cases where** the limitations are t

In cases of pregnancy, all State and Federal regulations are applicable. Please see your Resource, the Administrative Department for more information regarding pregnancy related work limitations and rights.

WORK HARDENING PROGRAM

Purpose: Many of our positions are physical in nature. To ensure safety and welfare, it is important to build up stamina to perform these responsibilities while minimizing the risk of injury. For that reason, a work hardening program has been established.

Criteria: Each Employee who is absent from their regular job duties for a prescribed number of weeks MAY be eligible for the work hardening program. The criteria for work hardening and the specific work hardening program will vary with:

- The responsibilities related to the job function.
- The length of time absent from the job (minimum of 2 weeks).
- The degree of illness or injury.

Each case will be treated on an individual basis with a set work hardening schedule for each circumstance. Check with your Resource or Administrative Dept. for the work hardening program that will be the most beneficial for your transition.

GUIDELINES

An Employee's medical return to work must be preceded by a physician's full release to active duty, release to work hardening with a full release at the end of the agreed upon work hardening assignment, or rehabilitative duty. All standard releases are to be approved by the Safety Team Members, Risk Manager. The Employee's Resource will be responsible for administering the individual's work hardening program. Extensions of the time-lines versus daily work modification will be reviewed critically.

EXAMPLES

Employee has been placed on rehabilitative duty for more than one week
Employee has been absent from work for more than four consecutive weeks
Employee has concluded a temporary work assignment and has returned to position

WORKERS' COMPENSATION

Purpose:	To provide injured Team Members insurance benefits for injuries sustained on the job.
Philosophy:	Stavis Seafoods Inc Employees are the most valued resource. It is our policy to take all necessary and responsible steps to eliminate or reduce exposure of Team Members to accidental injury and conditions which may adversely affect their health. No job is so important that we cannot take time to perform our work safely.
Procedure:	Worker's compensation is to provide injured employees insurance benefits for injuries sustained on the job.

DESCRIPTION/ADMINISTRATION

- Any employee who suffers a work related injury or illness is eligible for medical payments to cover physicians, surgeons, hospital and rehabilitation costs as long as the following criterion are met:
- The Plant Manager and Safety Director needs to be made aware of the injury. An Injury/Incident report to be filled out immediately.
- All appointments within the first 30 days from the date of injury need to be scheduled through the Plant Manager. The only exception to this is in the event an employee has requested in writing PRIOR TO THE INJURY that he/she see his/her own personal physician in case of an industrial injury, and Administrative Dept. has a copy of the name and address of this physician in the employee's personnel file.
- All medical payments for a work related injury or illness will be handled by Stavis Seafoods Inc Worker's Compensation administrator:

FOLLOW-UP MEDICAL CARE

Employees are encouraged to schedule treatment to occur outside of their work schedule. If treatment is not available outside of their work schedule, the Employee will not receive an attendance tardiness for either coming in late or leaving early provided that prior arrangements were made with the resource.

Safety and Health Programs

WorkPlace Security Program (Violence Prevention)

Stavis Seafoods Inc is committed to zero tolerance for violence. Any employee who believes that he or she, or Stavis Seafoods Inc, has been subjected to, or threatened with, a violent act by another individual, or has witnessed a violent situation, should immediately report such instances to his / her manager, lead, Human Resources or call the toll free line at 1-800-836-0975

Following the report of the incident, an appropriate investigation will be conducted in a prompt manner. Where the investigation confirms that a violation of the policy has taken place, immediate and appropriate corrective actions will be taken. Employees who are found by Stavis Seafoods Inc to have engaged in violent or threatening behavior will be disciplined or terminated from employment and may be subject to personal liability should any legal action be brought against them and / or Stavis Seafoods Inc

There will be no retaliation against employees for reporting, in good faith, violence, or threat of violence, in the workplace or assisting Stavis Seafoods Inc in the investigation of a related complaint.

Stavis Seafoods Inc recognizes that the issue of whether violence in the workplace has occurred requires a factual determination based on the evidence, if any. Stavis Seafoods Inc also recognizes that false accusations of violence or threats of violence can have serious effects. We trust that all employees will continue to act in a responsible and professional manner to establish a pleasant working environment with zero tolerance for violence.

BLOODBORNE PATHOGENS

(T8 CCR 5193)

Purpose: To eliminate or minimize Employee occupational exposure to blood or other potentially infectious materials. To prevent Employees from becoming infected with either the human immunodeficiency virus (HIV) which leads to aids or the Hepatitis B virus.

Philosophy: Stavis Seafoods Inc feels Employees are the most valued resource. It is our policy that no employee is expected, as part of their job duties, to render medical assistance or perform other activities which could expose them to potential infectious materials. Any employee that choses to administer treatment to a co-worker or other person, is acting as a "Good Samaritan" and is not covered by the OSHA Bloodborne Pathogens standard, i.e. Stavis Seafoods Inc is not responsible for any employee who experiences an exposure incident as the result of performing a "Good Samaritan" act.

Procedure: In accordance with the OSHA Bloodborne Pathogens Standard, T8 CCR 5193, the following Exposure Control Plan has been developed.

Stavis Seafoods Inc has an agreement with the local Fire Department to provide clean up service in the event of a blood incident.

The Fire Department will also handle the blood contaminated waste using appropriately marked and colored Biohazard bags. The bag colors shall be red, orange-red or orange with letters or symbols in contrasting color.

TRAINING

It is Stavis Seafoods Inc stated policy that no employees are expected to render aid and assistance (Good Samaritan policy) or provide clean up in the event of a blood incident. That means there are no employees who are occupationally exposed to potentially infectious material as part of their normal work activity. However, as a precautionalry measure, all team members are provided training at the time of initial assignment and annually there after.

Training sessions shall be documented and include the following:

A. An explanation of the bloodborne pathogens standard (T8 CCR 5193) and the fact that a copy of the text of this standard will be accessible to team members at all times.

B. A general explanation of the epidemiology, modes of transmission, and symptoms of bloodborne diseases.

C. An explanation of the facility's exposure control plan and the means by which team members can obtain a copy of the written plan.

D. An explanation of the procedure which might cause exposure to blood and other potentially infectious materials.

E. An explanation of the use and limitations of methods that will prevent or reduce exposure including engineering controls, work practice controls, and personal protective equipment.

F. Information on the types, proper use, location, removal, handling, decontamination, and disposal of personal protective equipment.

G. Information on the Hepatitis B vaccine and a statement that the vaccine will be offered free of charge.

H. An explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available.

I. Information on the post-exposure evaluation and follow-up that the employer is required to provide for the Employee following an exposure incident.

J. An explanation of the signs and labels and/or color coding that is used in the facility.

K. An opportunity for interactive questions and answers with the person conducting the training session.

RECORDKEEPING

Since our policy is that no employee are required to render medical assistance or perform other activities that could expose them to infectious materials, medical record retention is not required, however in the event that exposure occurs the following policy will be utilized: medical records pertaining to this policy shall be retained for the duration of employment plus 30 years in accordance with T8 CCR 5193.

These medical records shall include:

A. Name and social security number of the Employee,

B. Copy of Employee hepatitis B vaccination records,

C. Circumstances of an exposure incident, including a description of the exposed Employee's duties as they relate to the exposure incident, and results of the source individual's blood testing, if available.

D. Copy of all results of physical and medical examinations and testing and follow-up procedures related to the team member's ability to receive vaccination or to post exposure evaluation, including the evaluating physician's written opinions.

Medical records shall be kept confidential and shall not be disclosed or reported to any person except as required by law or through written authorization of the affected Employee. Should an exposure incident occur, medical records will be retained for 30 years.

Training records pertaining to this policy shall be retained for three years.

CONFINED SPACE ENTRY

(T8 CCR 5157)

Purpose: To protect team members from the hazardous conditions associated with confined space entries.

Philosophy: **Stavis Seafoods Inc feels Employees are the most valued resource. It is our policy not to enter any permit required confined entry space. It is also our policy that contractors take all necessary and responsible steps to eliminate or reduce exposure of their Employees to accidental injury and conditions which may adversely affect their health. No job is so important that we cannot take time to perform our work safely.**

Procedure: ***If contractors are required to enter permit required confined spaces, they will comply with OSHA's Permit-Required Confined Spaces Standard, T8 CCR 5157.***

IDENTIFICATION OF CONFINED SPACES

A confined space is a room, structure, container, ventilation or exhaust duct, pit, tank, hopper, silo, or other similar space that has limited or restricted means for entry or exit and is not designed for continuous employee occupancy. Such spaces require a permit for entry when they have one or more of the following characteristics:

1. Contains or has a potential to contain a hazardous atmosphere
2. Contains a material with the potential for engulfment of an entrant
3. Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor that slopes downward and tapers to a smaller cross-section, or
4. Contains any other recognized serious safety or health hazard.

Using the definition above, Stavis Seafoods Inc will perform an annual Confined Space assessment to ensure all confined spaces are identified and employees are aware of them. All employees shall receive annual General Awareness Confined Space training. The annual training will consist of:

1. Definition of a confined space
2. List of confined spaces
3. Review of our non-entry policy
4. Prior to selection of any contractor for Confined Space entry, they will be expected to provide training documentation that they are qualified for permit required confined space entry. The documentation will be forwarded to the Safety Director and Site Lead who will investigate credentials and certify the the contractors meet Stavis Seafoods Inc Confined Space policy and T8 CCR 5157.

LIST OF CONFINED SPACES

The following areas have been identified as the only confined spaces in at the Stavis Seafoods Inc facility:

- 1) Trash Compactor

CONTRACTOR SAFETY

(T8 CCR 1509)

Purpose: To ensure compliance of Contractors performing work at our facility, with all applicable Occupations Safety and Health Association (OSHA) standards.

Philosophy: This program has been developed to establish safe working procedures and practices for all contractors performing work at Stavis Seafoods Inc. It is the intent of these policies and procedures that no Contractor will be injured while performing work at our facility. It is also our policy to include contractor safety performance (i.e. IRR and LTI) prior to awarding any contracts.

Procedure: This program seeks to enhance safety in the workplace by requiring Contractors to educate themselves, their employees, and their subcontractors of our high standards for safe work practices in our facility. Completion of the Contractor Safety Sign-Off is mandatory prior to the beginning of any scheduled Contractor assignment. Each contractor is responsible for reviewing Stavis Seafoods Inc Contractor Safety with their employees and subcontractors, and to ensure compliance.

Stavis Seafoods Inc requires full compliance with its safety and health policies and practices. Contractors who do not comply with these policies and practices shall not be permitted to work at Stavis Seafoods Inc.

No work will be performed by any contractor until written proof of current liability insurance, accident frequency and workmen's compensation coverage has been documented to the project point person.

A copy of this policy as well as all other pertinent policies should be provided to each contractor by the Project Point Person. The contractor should review and acknowledge agreement with this policy by signing the Contractor Safety Sign-Off.

Contractor employees shall be required to wear suitable personal protective equipment (PPE), such as eye, head, foot, hearing, face, and respiratory protection, or any other PPE deemed necessary. The contractor should certify that all contractor personnel have been instructed in the use of and are authorized to use, any required personal protective equipment. Contractors should provide their own personal protective equipment.

Contractors are required to comply with all OSHA standards including but not limited to the following:

- Accident Investigations
- Bloodborne Pathogens
- Confined Space
- Electrical
- Emergency Operations
- Fall Protection
- Powered Industrial Trucks
- Hazardous Communication
- Hearing Conservation
- Hot Work
- Lock Out/Tag Out
- Personal Protective Equipment
- Respiratory
- Walking and working

Stavis Seafoods Inc feels that added safety awareness training promotes employees to work safely by teaching them that "Safety is a condition of their employment." The contractor Safety Sign-Off must be completed prior to beginning any contracted work at the Stavis Seafoods Inc. The Safety Sign-Off is an acknowledgment of understanding of expected compliance policies. This documentation will be maintained by the Site Lead / Safety Director. Compliance with the Stavis Seafoods Inc Safety and Health Programs is a NO DEBATE policy. Contractor employees that choose to disregard our demand for safe work practices and OSHA compliance will be subject to subsequent discipline.

DISCIPLINE

Stavis Seafoods Inc requires full compliance with its safety and health policies and practices. Contractors who do not comply with these policies and practices shall not be permitted to work at Stavis Seafoods Inc .

Safety violations are of great concern to Stavis Seafoods Inc and are considered very serious. Discipline is determined after thorough investigation has been completed identifying accident causes. If the investigation reveals that an unsafe act contributed to the incident, the contracted employee will be asked to immediately rectify the situation or leave the premises. All contractors working at the Stavis Seafoods Inc are subject to the same safety requirements as all Stavis Seafoods Inc employees.

INJURY REPORTING

Contractors are responsible for completion of their own accident investigations. In the event that an accident occurs on-site, the injury must be reported to the facility safety office. Contractors must also supply a copy of the accident report to the safety office. As part of the contractor review process, contracted work is based on a Company's accident frequency. Companies with a high accident frequency will not be awarded the job. Any resulting death must be reported to OSHA within eight hours of the incident. Multiple injury cases must be reported to OSHA within 24 hours. The scene must be secured and in tact until the inspection is complete.

CUTTING/WELDING

(T8 CCR 4846 – 48480)

Purpose: To enhance the commitment to safety by addressing the requirement of using a hot work permit for any temporary operation involving open flames or producing heat and/or sparks. This includes, but is not limited to: Brazing, Cutting, Grinding, Thawing Pipes, Torching or Welding.

Philosophy: Stavis Seafoods Inc feels Employees are the most valued resource. It is our policy to take all necessary and responsible steps to eliminate or reduce exposure of Employees to accidental injury and conditions which may adversely affect their health. No job is so important that we cannot take time to perform our work safely.

Procedure: A cutting and welding permit program is established and in effect for the Stavis Seafoods Inc employees including contractors. The permit program requires the area to be inspected prior to work by an individual responsible for authorizing cutting and welding operations. Fire prevention precautions are taken before cutting and welding operations begins including the following:

- A. All moveable fire hazards are removed. If hazards can not be removed, barriers or covers are put in place.
- B. Fire extinguishing equipment is readily available.
- C. A fire watch is maintained.
- D. Floors are swept clean in the immediate welding area.

Training in the cutting and welding permit program occurs annually.

CYLINDER STORAGE

Oxygen cylinders are stored separately from fuel-gas cylinders or combustible materials by a minimum distance of 20 feet. Compressed gas cylinders caps are secured in place. All compressed gas cylinders both full and empty are secured to prevent them from falling over including oxygen, fuel-gas, inert gases, propane cylinders, etc.

Adequate mechanical ventilation is provided in cutting and welding areas when activities are as follows:

- A. Spaced of less than 10,000 cubic feet per welder.
- B. Room having a ceiling less than 16 feet high.
- C. Confined spaces or where welding space contains partitions or structural barriers that significantly obstruct cross ventilation.

When arc welding equipment is not in use, electrodes have been removed to prevent inadvertent operations.

This procedure shall be implemented while doing hot work in an area that meets the criteria detailed in the Factory Mutual's Hot Work Permit program. All designated areas will be reviewed with all affected team members and outside contractors, who have the potential of performing hot work. Any hot work performed on combustibles or flammables shall provide a firewatch for the duration of the operation and one hour after completion.

HOT WORK: Prior to hot work being performed, the fire safety representative and/or Site Lead shall consider if the hot work can be avoided or if there is a safer way to perform the work.

The Employee who is conducting the hot work shall follow-up with all precautions to ensure compliance. For example: all moveable fire hazards removed. If hazards can not be removed, then barriers or covers will be used. If applicable, fire watch maintained and floors swept clean in immediate area.

Once it is determined hot work is necessary, the fire safety representative and / or Site Lead shall initiate the permit process.

- Permit is obtained from Factory Mutual Hot Work Permit System Wall Kit.
- Familiarize yourself with the safeguards listed on the permit and ensure area complies with all precautions.
- A hot work permit is issued by an accountable individual, i.e.. fire safety representative, Site Lead and/or Plant Manager.
- Top portion of permit is retained by fire safety representative or other key individual.
- Bottom portion of permit is issued to person performing the hot work. Permit is posted at site of hot work.
- After completion of hot work, an inspection of area is conducted by operator one hour after operation.
- The fire watch representative or other key individual monitors area four hours after completion and removes permit from location of operation.

- Permit is retained for one year.

TRAINING

All affected team members shall be trained annually and training shall be documented. The training will consist of:

- the hot work permit program
- fire prevention precautions
- how to complete a hot work permit.
- fire safety representatives or key individuals
- responsibilities
- location of Factory Mutual's Hot Work Permit System Wall Kit

CONTRACTORS

All contractors are expected to follow this program unless they have a program that exceeds our expectations.

ELECTRICAL SAFETY

(T8 CCR 2340)

Purpose: To prevent electric shock or other injuries relating from either direct or indirect electrical contacts, when work is performed near or on equipment or circuits which are or may be energized.

Philosophy: Stavis Seafoods Inc feels Employees are the most valued resource. It is our policy to take all necessary and responsible steps to eliminate or reduce exposure of Employees to accidental injury and conditions which may adversely affect their health. No job is so important that we cannot take time to perform our work safely.

Procedure: All Electrical work at the Stavis Seafoods Inc is performed by licenced electrical contractors. Specific safety-related work practices / training shall be consistent with the nature and extent of the associated electrical hazards.

This program covers General Awareness electrical safety-related work practices / training for unqualified personnel.

WORK PRACTICES / TRAINING

All employees shall receive basic General Awareness electrical training annually that covers the following topics:

INTERLOCKS

Only a qualified person may defeat an electrical safety interlock, and then only temporarily while he or she is working on the equipment. The interlock system shall be returned to its operable condition when this work is completed. All necessary requirements listed under this section (Working On or Near Exposed Energized Parts) must be met. If necessary, a qualified electrical contractor will be used.

Portable Electric Equipment

This paragraph applies to the use of cord and plug-connected equipment, including flexible cord sets (extension cords).

A. HANDLING

Portable equipment shall be handled in a manner which will not cause damage. Flexible electric cords connected to equipment may not be used for raising or lowering the equipment. Flexible cords may not be fastened with staples or otherwise hung in such a fashion as could damage the outer jacket or insulation.

B. VISUAL INSPECTIONS

Portable cord, plug-connected equipment and flexible cords set (extension cords) shall be visually inspected before use on any shift for external defects and for internal damage. Cord and plug connected equipment and flexible cord sets (extension cords) which remain connected once they are put in place and are not exposed to damage need not be visually inspected until they are relocated.

C. DEFECTS

If there is a defect or evidence of damage that might expose an Employee to injury, the defective or damaged item shall be removed from service, and no Employee may use it until necessary repairs and tests to render the equipment safe have been made.

D. MATING CONFIGURATION

When an attachment plug is to be connected to a receptacle (including any on a cord set), the relationship of the plug and receptacle contacts shall first be checked to ensure that they are of proper mating configurations.

E. GROUNDING-TYPE EQUIPMENT

A flexible cord used with grounding-type equipment shall contain an equipment grounding conductor.

F. ATTACHMENT PLUG / RECEPTICAL ALTERATION

Attachment plugs and receptacles may not be connected or altered in manner which would prevent proper continuity of the equipment grounding conductor at the point where plugs are attached to receptacles. Additionally, these devices may not be altered to allow the grounding pole of the plug to be inserted into slots intended for connection to the current carrying conductors.

G. ADAPTERS

Adapters which interrupt the continuity of the equipment grounding connection may not be used.

H. CONDUCTIVE WORK LOCATIONS

Portable electric equipment and flexible cords used in highly conductive work locations, such as those inundated with water or other conductive liquids, or in job locations where Employees are likely to contact water or conductive liquids shall be approved for those locations.

I. CONNECTING ATTACHMENT PLUGS

Employees' hands may not be wet when plugging and unplugging flexible cords and cord and plug-connected equipment, if energized equipment is involved.

ERGONOMICS PROGRAM

(T8 CCR 5110)

- Purpose:** The purpose of this program is to communicate to all Stavis Seafoods Inc Employees, that we are committed to improve the comfort and well being of our Employees, by identifying and correcting ergonomic risk factors on the job. This program applies to all areas of our business. The Safety Team is constantly reviewing the program with the help of the Employees. The Safety Team reviews and gives guidance when needed.
- Philosophy:** Stavis Seafoods Inc feels Team Members are the most valued resource. It our policy to take all necessary and responsible steps to eliminate or reduce exposure of Employees to accidental injury and conditions which may adversely affect their health. No job is so important that we cannot take time to perform our work safely.
- Procedure:** Under this program, our Safety team will evaluate any jobs that they have identified as being ergonomically "high risk ". The Team will develop and implement solutions to reduce job-related worker injury and illness. Our goal through this ergonomic program is to prevent the occurrence of work related musculoskeletal disorders by controlling or eliminating the risk factors that cause them. This program ensures that all affected Employees are aware of job-related risk factors and provides information and solutions to evaluate them. Stavis Seafoods Inc promotes continuous improvement for the efficiency, comfort, and well-being of all Employees through a combined effort of the Safety team member involvement.
- If, after reading this program, you find that improvements can be made please contact your Operations Resource. We encourage all comments and suggestions because we are committed to the success of our ergonomics program. We strive for clear understanding, safe and efficient work practices, and involvement in the program from every level of the company.

ERGONOMICS TEAM

*** Need Ergonomics Team**

ERGONOMICS TEAM TRAINING

All ergonomics team members have been trained in the following elements: Introduction to Ergonomics, The Need for Ergonomics, Human Capabilities and Limitations, Hazard Prevention and Control Strategies, The Application of Ergonomics for Manual Materials Handling, Ergonomic Principles for Industrial Applications, Worksite Analysis, Ergonomic Assessments, Principles and Applications of Ergonomics, Injury Prevention, Exercise and How it Affects the Body, Nutrition and General Health, and Stress Management and Reduction.

TEAM MEMBER ACCOUNTABILITIES

All employees are required to stretch before starting work and are required to follow the ergonomic practices throughout their scheduled shift. We strongly encourage all employees to immediately report any pain or discomfort to any Safety team member, or their Resource.

ERGONOMICS TEAM ACCOUNTABILITIES

The ergonomics evaluation team will evaluate all employees in high risk jobs periodically. During the first four weeks of employment, new employees will be evaluated weekly.

The ergo team will closely monitor and update, (as needed), the Onboarding Transition Program and determine best course of action to help the individual work through their opportunity.

The Site Lead, Plant Manager and Safety Director are responsible for maintaining the OSHA 300 Injury and Illness form, and periodically updating the Trend Analysis. Every work procedure that causes a worker injury or illness will be investigated and reported. This documentation provides vital information for the identification of job related risk factors so that the problems can be corrected before other injuries can occur. After an injured employee has been treated by the health care provider, the Safety Committee Team will monitor the recovery process and the employees return to work. The Ergo Team or Safety Committee Team has developed a list of light and restricted duty jobs that have low

musculoskeletal risks. This is a valuable resource for assigning duties to recovering employees until they can resume their normal job functions. These jobs may include, but are not limited to: Sanitation tasks, Inventory, etc TBD.

After verification of a team employees job-related injury or illness, the Safety Committee Evaluations Team will review this program and re-evaluate the work station to determine if additional practices, procedures, or redesign of the station could be implemented to prevent similar injuries.

IDENTIFYING PROBLEM AREAS

There are several methods used to identify problem areas that are most likely to result in ergonomic disorders. The Ergo Team periodically monitors the Trend Analysis report that is generated which tracks injuries by period, department, and type of injury. The Ergo Team also evaluates all employees in high risk jobs once a period.

J.S.A.s (Job, Safety, Analysis), are also the responsibility of the ergo team, which are monitored and updated periodically (if discrepancies in the procedures are found). All new equipment and or processes will be evaluated by a member of the Ergo Team, and an assessment completed if risk factors are found.

When problem areas and / or jobs have been identified, they are evaluated for the following risk factors:

- **Rate and number of repetitions:** performance of the same motion or motion patterns every few seconds for more than two hours at a time.
- **Postures and limb positions:** fixed or awkward work postures such as overhead work, twisted or bent back, bent wrist, stooping, or squatting, for more than a total of two hours.
- **Vibration:** use of vibrating or impact tool or equipment for more than a total of two hours.
- **Loads/lifted:** lifting, lowering, or carrying any thing weighing more than 25 pounds (11.34 kg.) more than once during a work shift.
- **Loads / static:** Holding a fixed or awkward position with arms neck for more than ten seconds.
- **Muscle forces:** continually pulling or pushing objects.
- **Work pace:** piece rate or machine paced work for more than four hours at a time (legally required breaks cannot be included when totaling the four hour limit).

Once the risk factors have been identified through the above criteria, the Safety Committee evaluation team will work with the affected employees to ensure safety.

SOLUTIONS

When a job, process, and / or equipment have been identified as having risk factors, the Ergo Team completes a employee evaluation and / or ergonomic assessment of the job, process, and / or equipment. Through this process opportunities are identified for correction and resources and Employees in the affected areas are notified. The Ergo Team, in conjunction with those affected Employees, will develop possible solutions, choose the most appropriate changes to be made, implement the changes, and follow-up to determine the effectiveness of those changes. A file will be created for each team member or job that is assessed or evaluated. This file will contain all information collected through the assessment process. These files are confidential and may only be reviewed by authorized personnel.

Any employee that receives an evaluation score of four or above will receive the following help.

- Trained Evaluators will offer educated feedback and suggestions to the team member.
- The team member will be evaluated throughout the period to document improvement.
- If evaluation scores do not improve the team member will be counseled by the Ergo team and their Resource and an action plan developed to help the team member overcome the opportunity.
- **Failure to follow this action plan may result in discipline up to and including termination.**

TEAM MEMBER TRAINING

All team members receive ergonomics training at the time of hire, and periodically throughout the year. A copy of this program will be posted in an area where all team members will have access.

Stavis Seafoods Inc Management and Supervisors receive copies of this written ergonomics program and the company's policy statement regarding ergonomics in our workplace. They also will attend the same periodic training as Employees.

All Employees should be aware of the approved medical facilities both for regular business hours and for after hours care. If Employees use an after hours medical facility, they should be referred to the approved occupational medical physician for a follow-up visit as soon as possible.

TRAINING REQUIREMENTS

It is important to train all team members in the signs and symptoms of CTD's and in proper body mechanics and work techniques. This can be accomplished through the following:

- a. Orientation: All team members are required to attend an orientation prior to beginning the job. The orientation topics include, but are not limited to, Hazard Communication, CTD Awareness Training, Injury/Illness reporting requirements, accident investigation, as well as other safety and human resource related topics.
- b. Ergonomic Training: All Employees receive training specific to their job. This training includes, but is not limited to, proper body mechanics

and work techniques, identification of CTD symptoms in high -risk tasks, and job safety analyses.

c. Annual Training: All team members in high-risk tasks receive training annually in the signs and symptoms of CTD's early intervention, preventive measures, and medical treatment options.

d. Monitoring: All team members who perform high-risk are video-taped at least annually with a follow-up feedback session to discuss their work techniques and body mechanics and any necessary corrective actions. The monitoring and feedback sessions are conducted by the Ergonomic Action Team. It may be necessary to re-evaluate the ergonomics program at an unplanned interval of time. The point at which this may become necessary is determined by an increase in the severity of the reported CTD's. Severity is defined as lost time vs. no lost time.

When CTD's result in lost work the following measures are recommended.

- a. Invite an approved occupational medicine physician, physical therapist, or ergonomist to meet with the Plant manager, Ergonomic Action Team, and/or safety leadership team members on a consultation basis. This meeting should focus on identified trends, high risks tasks and work techniques.
- b. The above named group of individuals should perform a work site analysis to determine what is being done correctly and what is being done incorrectly. The group should develop actions to address the identified issues. The group should also solicit input from work teams that are affected by the analysis.
- c. The selected consultant should schedule 1 on 1's with team members who have experienced CTD's or who have physical complaints arising from their work to discuss the complaints and possible corrective actions.
- d. The selected consultant should conduct a survey of all team members to determine the effectiveness of the Ergonomics Program. The results of the survey should be shared with team members along with recommend actions for corrective actions.

ENFORCEMENT

Consistent awareness of and respect for ergonomic hazards, and compliance with all safety rules are considered conditions of employment. The Stavis Seafoods Inc Management team will issue disciplinary warnings to Employees, up to and including termination for failure to follow the guidelines of this program.

This company will not implement any policy or practice that discourages reporting or which results in discrimination or reprisal against any Employee who makes a report.

EMERGENCY PREPAREDNESS

(T8 CCR 3220)

- Purpose:** To maintain standardized facility-wide guidelines to ensure that fast and proper actions are taken in case of a facility emergency situation.
- Philosophy:** Stavix Seafoods Inc feels Employees are the most valued resource. It is our policy to take all necessary and responsible steps to eliminate or reduce exposure of Employees to accidental injury and conditions which may adversely affect their health. No job is so important that we cannot take time to perform our work safely.
- Procedure:** The following general guidelines and procedures are applicable to Stavix Seafoods Inc team members during a facility emergency situation:
- A. Use common sense and remain calm at all times.
 - B. All personnel shall comply with current emergency procedures and obey the instructions.
 - C. Be familiar with the locations of fire exits, fire alarm pull stations and fire extinguishers in your work area.
 - D. Be familiar with what you should do to shut down your work station in the event of an evacuation or electrical blackout condition.
 - E. Upon discovery of a fire or other emergency, facility personnel shall activate the nearest fire alarm pull station in the area.
 - F. If practical, Employees trained in the use of fire extinguishers shall attempt to combat the emergency. At no time, however, are those persons to place his / her life in danger.
 - G. Employees must keep the telephone and paging system open during emergency situations.
 - H. Alarms should never be considered false. Employees must always evacuate the building until given the all clear signal.
 - I. When an order to evacuate the facility is issued, all personnel will follow the established routes to the nearest exit in an orderly manner and report immediately to their designated evacuation area for a headcount.
 - J. Personnel shall not block access routes or hinder the efforts of the Safety Committee Team during the emergency.
 - K. Do not re-enter the building until the all-clear signal is given.

EVACUATION PROCEDURES

The evacuation procedures listed below apply to all emergencies and are to be adhered to as much as possible.

When the alarm sounds:

- Shut down your work area and evacuate through the preplanned routes.
- Proceed immediately to your evacuation area outside the building for a headcount and further instructions.
- All warehouse and Production employees are to meet at the Cafeteria section of the parking lot (Nearest Street Name needed.).
- All admins and office personel (first and Second Floors) are to meet at the South end of the front office parking lot (Nearest Lightwave ave.).
- The designated point person (Departmental Supervisors) will take charge and conduct an accurate headcount and will be responsible for maintaining group integrity. He/she should expect to file a report immediately following the conclusion of the emergency.
- Do Not re-enter the building until your point person has given you the "all-clear" sign.

BLACKOUT PROCEDURES

In the event of an electrical blackout of the site, the following procedures shall be used:

- Stay where you are until someone with a flashlight can find and escort you to the designated parking lot.

EMERGENCY LIGHTING, FIRE EXTINGUISHER AND EYE WASH STATION INSPECTION:

- All fire extinguishers and fire hoses throughout the Stavis Seafoods Inc facility are to inspected every period.
- All emergency lights throughout the Stavis Seafoods Inc are inspected on a period basis.
- All eyewash stations throughout the Stavis Seafoods Inc are to be inspected each period by Production/QA personnel.

FIRE FUNDAMENTALS

Three things must be present to have a fire; fuel, oxygen, and heat. Remove any one of these three and you will extinguish a fire. Fires are classified by the type of fuel that they burn. There are three general classes of fires:

Class A - This class of fire consumes wood, paper, dried product or other materials that leave a white ash. Recommended extinguishing agent: ABC Fire Extinguisher or water.

Class B - This class of fire consumes oil and produces black smoke. Recommended extinguishing agent: Carbon Dioxide (CO₂) for fryer fires and ABC Fire Extinguishers for other oil fires. Note: Never use water on a fryer fire as this will cause an explosion.

Class C - This class of fire occurs when electrical equipment overheats or sparks. Recommended extinguishing agent: Carbon Dioxide (CO₂) or ABC Fire Extinguishers if CO₂ is not available.

Note: When attempting to fight an electrical fire, your first action should always be to secure the power. Operators should be aware of the locations of all switches and breakers that power their equipment.

FIRE PREVENTION

The best way to fight a fire is to prevent it from ever happening. The following good practices can significantly reduce the chance of a fire ever occurring:

1. Always obey no smoking signs.
2. Keep flammable liquids away from open flames and anything that sparks. When dispensing a flammable liquid, ground the container to prevent sparks from static electricity.
3. Clean up flammable liquid spills immediately, and put the rags in a covered container.
4. Store flammable liquids in approved storage containers. Clearly and label all containers for flammable and combustible liquids.
5. Always maintain good housekeeping habits. Clean dust off machinery. Clean up and repair oil leaks. Regularly remove trash from work area. Return equipment and tools to their proper places. Never block passageways / aisles.

6. Turn off electrical equipment when not in use.
7. Use extension cords only when necessary. Use cords with heavy gauge wire and a grounding pin.
8. Prior to use, always inspect electrical equipment, cords and plugs for frayed wire, damaged prongs or other problems. Have maintenance repair all damage before using the equipment.
9. Periodically monitor electric cords and equipment for overheating. Oil soaked cords or dripping insulation are possible clues that the equipment is overheating.
10. Use the correct fuse. Too much amperage can cause equipment to overheat.
11. When welding, cover all flammable materials in the area with flame resistant drop clothes and covers. Ensure a fire extinguisher is on the work site.
12. Keep alert to conditions which are ideal for spontaneous combustion. These conditions include rags and solvents. Do not store near buildings.

IN THE EVENT OF A FIRE

1. If properly trained to fight a fire, the Resource or point person uses the proper extinguishing agent to put out the fire. Ensure ventilation is adequate for breathing in the vicinity of the fire. Do not put yourself at risk from being overcome by smoke or fumes.
2. Evacuate the facility if the fire can not be quickly extinguished. If any doubt exists about whether a particular situation warrants evacuation then evacuation should occur. Only make the decision not to evacuate if it is apparent that the fire is small and easy to extinguish. This decision will be made by the Resource or point person.
3. When the fire department arrives, the Resource or point person provides them with the location of the fire and any other information they request.

BOMB THREAT

These procedures are designed to minimize panic, confusion, potential injury to personnel, and damage to company property. Adequate preparation is the single most important factor in properly handling a bomb threat. Without advance organization and planning, the threat of an explosion may create an atmosphere of extreme anxiety and panic.

If an Associate receives a bomb threat, as much information as possible about an alleged bomb placed in the Stavis Seafoods Inc should be obtained from the person making the threat. Therefore, any Employee who receives a bomb threat should remain calm and follow the below listed procedures:

- Be sure to remain calm.
- Keep the caller on the line.
- Obtain as much information as possible.
- Ask someone else to monitor the call.
- If possible, turn the call over to the a Supervisor or Plant Manager.
- Try to obtain the time the alleged bomb is scheduled to explode, location and reason for threat.
- Make an educated judgment of the identity of the caller, (race, sex, age). Note any distinguishable accents and background noises.

Immediately write down any information or observations obtained during the call. Notify the Safety Director or Plant Manager as soon as possible.

RIOTS

In the event of a riot at or near the Stavis Seafoods Inc Site, a concerted effort by the Resource or point person to develop an effective riot response plan should minimize the potential for injury to personnel and damage to property and equipment.

During the development of a riot response, the Resource or point person should try to anticipate circumstances that might arise if a riot occurs. Little can be done except to notify the authorities. Precautions can be taken to protect Employees and property. Riot activity is usually meant to destroy property or disrupt normal distribution, the Resource or point person should try to identify and protect the areas that are likely targets for riots. For example, equipment vital to production, shipping and receiving, windows and glass doors, office areas and records vital to company operations, and gas and fuel liners.

Methods of protection vary depending on type of riot and where it is conducted. The Resource or point person must decide what precautions should be taken. Most of the time the Resource or point person will have advance warnings of developing riot situations and can take appropriate precautions. In all cases, no action will be taken that places our Associates in potentially dangerous situations. All decisions will be made with the Safety of our Associates as the prim deciding factor.

FALL PROTECTION

(T8 CCR 1670)

Purpose: To provide safety standards specifically designed to address the use of fall protection in areas that have leading edge work and unprotected sides or edges, and to ensure that each team member is trained and made aware of the safety provisions which are to be implemented in regards to fall protection.

Philosophy: Stavis Seafoods Inc Employees are the most valued resource. It is our policy to take all necessary and responsible steps to eliminate or reduce exposure of Team Members to accidental injury and conditions which may adversely affect their health. No job is so important that we cannot take time to perform our work safely.

Procedure: This program only applies to facilities where an employee must work within 6' of a 4' fall. If through work practices, the hazard can be eliminated, then the program is unnecessary. However, if it is not possible to avoid placing an employee within 6' of a 4' fall, then the fall protection program must apply. Each employee working on a walking / working surface (horizontal and vertical surface) with an unprotected side or edge which is 4 feet or more above a lower level shall be protected from falling by the use of guardrail systems, personal fall arrest or fall restraint systems.

The kind of fall arrest system selected should match the particular work situation and any possible free fall distance should be kept at a minimum.

Consideration should be given to the work environment. For example, the presence of dirt, moisture, oil, grease, and their effect on the system, should be evaluated. Climate controls may also have an adverse effect on the system. Wire rope should not be used where an electrical hazard is anticipated.

Employees shall be protected from holes (gap more than 2" in its least dimension) by a fall arrest system or by covering the holes. Work orders will be written and given priority when holes and gaps are found.

When overhead work is being performed all tools and equipment not in use will be secured in such a way as to prevent them from falling. The area directly beneath overhead work will be clearly marked indicating the potential for falling objects.

Each employee will be trained in these procedures and will strictly adhere to them unless the Employee feels it will expose them to a greater hazard. If this is the employee's opinion, he / she will address the concern to the Safety Team Committee. The concerns will then be addressed before proceeding.

DRY STORAGE WAREHOUSE

All job tasks that require team members to work at elevations above 4 feet with an unprotected side or edge shall be performed with a Powered Industrial Platform, Aerial Lift or OSHA approved safety platform. The use of self retracting lifeline or lanyard and full body harness is mandatory.

When sorting and arranging Label and other packaging materials on the second level dry storage area, NEVER approach any leading edge. Stay at least 6 feet from all exposed areas. Failure to stay at least 6 feet away is a level one incident which can result in disciplinary action up to and including termination. (This is a very serious issue and must be corrected for Dry Storage and Sanitation of the Hayssen Cups)

EQUIPMENT Personal fall arrest systems shall comply with all provisions of T8 CCR 1670 and ANSI STD 358.1. Effective 1/1/98, body belts (safety belts) are not acceptable as part of a personal fall arrest system. Change this to title 8.

Fall protection equipment is readily available for Employees who are exposed to fall hazards. Prior to use the fall protection equipment must be visually inspected. Routine inspections are conducted monthly to identify any, cuts, tears, and loose connections.

The kind of fall arrest system selected should match the particular work situation and any possible free fall distance should be kept at a minimum. Considerations should be given to the work environment (i. e., wire rope should not be used when an electrical hazard is anticipated).

Full body harnesses shall be used only for team member protection and not to hoist materials.

Fall arrest harnesses and all fall arrest equipment shall be inspected prior to each usage for damage and other deterioration. Defective components shall be removed from service. All falls or activation of an arrest system must be reported immediately and equipment taken for inspection.

FALL PROTECTION ASSESSMENT

Through the use of a fall protection hazard assessment, the following areas have been identified as requiring fall protection:

Inventory racks – Employees and contractors are required to use safety cage and forklift for lifting to storage location when doing inventory and are not required to wear fall protection as long as they stay within the guard rails provided. However, 100% fall arrest must be used when breaking the plain of the guard rails or climbing out of scissors lift. Employees must use a full body harness attached to a retractable lanyard. The lanyard must be attached to the anchor point on the safety cage. After lifting employee in the safety cage, the forklift operator must turn off forklift, remove keys before giving the employee in the cage the “OK” to leave the cage. The lift operator must stand watch at the lift to assure lift is not moved while the other employee is outside of cage.

Receiving and Bulk 24 Loading Docks – Doors at these docks must remain closed when there is not a trailer/truck at the dock.

EMERGENCY RESCUE PLAN

In the case of a fall, the forklift operator who is standing watch will assist the employee down. If necessary, he/she will seek assistance from another employee and/or call 911 for emergency personnell assistance.

TRAINING

For those Employees who are exposed to fall hazards, an annual comprehensive training program is conducted. Fall protection training includes the following elements:

- A. The nature of fall hazards in the workplace.
- B. The correct procedures for erecting, maintaining, disassembling, and inspecting all protection systems to be used.
- C. Use and operation of fall protection systems. The use and operation of guardrail system, personal fall arrest system, safety net system, warning line system, safety monitoring system, and controlled access zones.
- D. Team Member accountabilities and responsibilities.

Training will be provided for each Employee who might be exposed to fall hazards. The Shipping & Receiving, sanitation, material handlers, and shall receive training.

The training shall enable each Employee to recognize the hazards of falling and the procedures to be followed in order to minimize the hazards. The trainer shall prepare a written certification record. The written certification record shall contain the name of the team member trained, the dates of training, and the signature of the person who conducted the training.

Retraining shall be conducted when the, Safety Committee Members, or the Employee(s) believe(s) that the affected Employee does not understand the requirements of this policy.

Retraining is appropriate under, but is not limited to, the following circumstances: (1) changes in the workplace tendering previous training obsolete; (2) changes in the types of fall protection used; (3) inadequacies in the affected team member's knowledge are noted.

POLICY ENFORCEMENT

Any Stavis Seafoods Inc Employee violating the provisions of this standard will receive enforcement and corrective action up to termination.

Any contractor who violates the provisions in this policy will be escorted off the premises.

DEFINITIONS

Anchorage - Means a secure point of attachment for lifelines, lanyards or **deceleration devices** which is capable of withstanding the forces specified in the applications sections of your State or Federal Regulations.

Personal Fall Arrest - System - Means a system used to arrest an employee in a fall from a working level. It consists of anchorage's connectors, body harness. It may include, lanyard, **deceleration device**, lifeline, or suitable combinations of these.

Positioning Device system - Means a body harness system rigged to allow an employee to be supported on an elevated vertical surface, such as a wall, and work with both hands free while leaning.

Body Harness - Means straps which may be secured about the employee in a manner that will distribute the fall arrest forces over at least the thighs, pelvis waist, chest and shoulders with means for attaching it to other components of the personal fall arrest system.

Lanyard - Means a flexible line of rope, wire pore, of strap which generally has a connector at each end for connecting the body harness to deceleration device, lifeline or anchorage.

Leading Edge - Means the edge of the floor, roof, or form work for a floor of to his / her walking / working surface (such as the deck) which changes location as additional floor, roof, decking, or form work sections are placed, formed and constructed. A leading edge is considered to be an "unprotected side and edge" during periods when it is not actively and continuously under construction.

Unprotected Sides and Edges - Each employee on a walking / working surface (horizontal and vertical surface) with unprotected side or edge which is four feet or more high shall be protected by a fall protection, safety net system, or guard rails.

Competent Person - Means an individual knowledgeable of fall protection equipment, including the manufacturer's recommendations and instruction's for the proper use, inspection, and maintenance; and who is capable of identifying existing and potential fall hazards; and who has the authority to take prompt corrective action to eliminate those hazards; and who is knowledgeable of the rules regarding the erection, use, inspection and maintenance of fall protection equipment and systems.

FIRE PROTECTION AND PREVENTION

(T8 CCR 1933)

Purpose: To maintain standardized facility-wide guidelines to ensure that fast, appropriate response occurs in case of any facility emergency situation.

Philosophy: Stavis Seafoods Inc Employees are the most valued resource. It is our policy to take all necessary and responsible steps to eliminate or reduce exposure of Employees to accidental injury and conditions which may adversely affect their health. No job is so important that we cannot take time to perform our work safely.

Procedure: The following general guidelines and procedures are applicable to all Stavis Seafoods Inc Employees **during any facility emergency situation:**

- Use common sense and remain calm at all times.
- Facility members shall operate a fire alarm pull station in the area and notify their teams.
- In the event of any emergency, do not use the telephone or radio system unless instructed to relay messages or instructions.
- There are no false alarms! If the fire alarm sounds, all employees will follow evacuation guidelines detailed in Emergency Preparedness and visually displayed on evacuation maps which are located throughout the Facility. In all other emergency situations, unless otherwise instructed, all associates will remain at their work stations awaiting specific directions from their Manager / Safety Committee Team Member.
- When instructed, machinery, equipment, and utilities shall be shut off (depending on the particular emergency and the time available).
- When an order to evacuate a facility or work area is issued, all associates will follow the established routes in an orderly manner and evacuate the facility area.
- Associates shall follow the instructions of the Resource or safety point person during any emergency.
- Members shall not block access routes or hinder the Resources efforts during any emergency.

Unannounced fire drills will be coordinated by the Safety Team Member(s), Plant Manager or Lead Person.

IN THE EVENT OF A FIRE

1. If properly trained to use a fire extinguisher use the proper extinguishing agent to put out the fire. Ensure ventilation is adequate for breathing in the vicinity of the fire. Do not put yourself at risk from being overcome by smoke or fumes.
2. Evacuate the facility if the fire can not be quickly extinguished. If any doubt exists about whether a particular situation warrants evacuation then evacuation should occur. Only make the decision not to evacuate if it is apparent that the fire is small and easy to extinguish. This decision will be made by the Safety Committee Member(s).
3. When the fire department arrives, the Safety Committee Member(s) provide(s) them with the location of the fire and any other information they request.

After using the fire extinguisher, place empty or used extinguisher in the Maintenance Shop or used extinguisher storage area and replace with proper fire extinguisher. Replace extinguishers in the same manner when seals are broken on extinguisher.

It Is The Duty Of Every Employee To See That The Passages, Stairways, And Fire Stations Are Kept Clear At All Times.

Definitions:

A Trained Individual Is One Who Has Attended A Stavis Seafoods Inc Training Class And Performed Hands On Training. I.E. Put Out A Fire.

FIRST AID RESPONDERS

(Good Samaritan)

- Purpose:** To maintain a standardized facility-wide system for obtaining emergency medical assistance in case of any medical emergency.
- Philosophy:** Stavis Seafoods Inc feels Employees are the most valued resource. It is the our policy that no employee is expected, as part of their job duties, to render medical assistance or perform other activities which could expose them to potential infectious materials. Any employee that chooses to administer treatment to a co-worker or other person, is acting as a "Good Samaritan" and is not covered by the OSHA Bloodborne Pathogens standard, i.e. Stavis Seafoods Inc is not responsible for any employee who experiences an exposure incident as the result of performing a "Good Samaritan" act.

HAZARD COMMUNICATION

(T8 CCR 5194)

Purpose: To provide information about chemical hazards and other hazardous substances, and the control of hazards via our comprehensive Hazard Communication Program which includes container labeling, Safety Data Sheets (SDS) and training.

Philosophy: Stavis Seafoods Inc Employees are the most valued resource. It is our policy to take all necessary and responsible steps to eliminate or reduce exposure of Employees to accidental injury and conditions which may adversely affect their health. No job is so important that we cannot take time to perform our work safely.

Procedure: We have developed a Hazard Communication Program to enhance our Employees' health and safety. The following program outlines how we will accomplish this objective.

CONTAINER LABELING

It is the policy of this company that no container of hazardous substances will be released for use until the following label information is verified:

- A. Containers are clearly labeled as to the contents.
- B. Appropriate hazard warnings are noted.
- C. The name and address of the manufacturer is listed.

To further ensure that team members are aware of the hazards of materials used in their work areas, it is our policy to label all secondary containers.

The **supervisor** in each section will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with a generic label which includes the identity of the chemical and the hazards associated with the chemical.

SAFETY DATA SHEETS (SDS)

Material Safety Data (MSD) Sheets describes required safety equipment that must be worn when handling chemicals. Copies of MSDS for all hazardous substances to which team members of this facility may be exposed are kept in the Right To Know Center. A designated person will be responsible for obtaining and maintaining the data sheet system for Stavis Seafoods Inc. All copies of all MSDS sheets can be obtained from the Safety Team Committee.

A Manager / Lead or point person, will review incoming data sheets for new and significant health/safety information. He or she will see that any new information is passed on to the affected Employees.

SDS will be reviewed for completeness by the Safety Committee Team members. If an SDS is missing or obviously incomplete, a new MSDS will be requested from the manufacturer. It is absolutely necessary for a complete MSDS to be on site prior to using any chemical. If a complete SDS is not received the chemical must not be used.

SDS are available to all Employees in their welfare room for review during each work shift. If SDS are not available or new hazardous substances in use do not have SDS, please contact the Director Of Safety or Safety Team Committee immediately.

EMPLOYEE INFORMATION AND TRAINING

Employees are to attend a health and safety orientation set up by the Safety Committee prior to starting work for information and training on the following:

- A. An overview of the requirements contained in the Hazard Communication Regulation, including their rights under the Regulation.
- B. Inform Employees of any operations in their work area where hazardous substances are present.
- C. Location and availability of the written Hazard Communication Program.
- D. Physical and health effects of the hazardous substances.
- E. Methods and observation techniques used to determine the presence or release of hazardous substances in the work area.

- F. How to lessen or prevent exposure to these hazardous substances through usage of engineering controls, work practices, and / or the use of personal protective equipment.
- G. Steps that Stavis Seafoods Inc has taken to lesson or prevent exposure to these substances.
- H. Emergency and first aid procedures to follow if team members are exposed to hazardous substances.
- I. How to read labels and review MSDS to obtain appropriate hazard information.
- J. Inform team members of substances in the facility that have been known in the State of Massachusetts to cause cancer or birth defects.

NOTE: It is critically important that all of our Employees understand the training.

When new hazardous substances are introduced, the Safety Committee Member(s) will review the above items as they are related to the new material in your work area safety meeting.

HAZARDOUS NON-ROUTINE TASKS

In nearly all instances, it is not necessary for associates to perform hazardous non-routine tasks. However, should it become necessary. prior to starting work on such projects, each affected Employee will be given information by their Manager / Lead about hazards to which they may be exposed during such an activity. This information will include:

- Specific hazards.
- Protective/safety measures which must be utilized.

Measures the facility has taken to lessen the hazards including ventilation, respirators, presence of another Employee and emergency procedures.